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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON**

**UNION GOSPEL MISSION OF YAKIMA,
WASH.,**

Plaintiff,

v.

ROBERT FERGUSON, ET AL.,

Defendants.

Civil Case No.: 1:23-cv-03027

**STIPULATED MOTION FOR
BRIEFING SCHEDULE AND TO
EXCEED PAGE LIMITS**

WITHOUT ORAL ARGUMENT

Plaintiff Union Gospel Mission of Yakima, Wash., and Defendants Robert Ferguson, Andreta Armstrong, Deborah Cook, Guadalupe Gamboa, Jeff Sbaih, and Han Tran, have stipulated to a consolidated briefing scheduling for Defendants' Motion to Dismiss and Plaintiff's Motion for Preliminary Injunction, and jointly move the Court to approve and order the same. The parties also request that the Court allow them to exceed the page limits for Plaintiff's Motion for Preliminary Injunction and Defendants' Response in Opposition and file briefs up to 20 pages in length.

Defendants filed a Motion to Dismiss on March 29, 2023. *See* ECF No. 11. Plaintiff intends to file a Motion for Preliminary Injunction no later than April 5, 2023. Pursuant to Local Rule 7, both parties' counsel conferred and contacted the courtroom deputy to obtain a hearing date for both motions. The courtroom deputy informed counsel that the Court would hold a joint hearing on both Defendants' Motion to Dismiss and Plaintiff's Motion for Preliminary Injunction on May 31, 2023, at 9:00 a.m, if both motions are filed within the time requirements. The courtroom deputy also informed counsel that "a consolidated briefing schedule would be beneficial." Accordingly, counsel conferred and propose the briefing schedule set forth below:

<u>Filing</u>	<u>Due Date</u>
Plaintiff's Motion for Preliminary Injunction	April 5, 2023

1	Plaintiff's Response to Defendants' Motion to Dismiss	May 3, 2023
2	Defendants' Response to Plaintiff's Motion for Preliminary Injunction	May 3, 2023
3	Plaintiff's Reply in Support of Motion for Preliminary Injunction	May 17, 2023
4	Defendants' Reply in Support of Motion to Dismiss	May 17, 2023

7 The parties have also conferred and stipulated to file briefs that exceed the
8 page limitations for Plaintiff's Motion for Preliminary Injunction and Defendants'
9 Response in Opposition. Local Rule 7(f) limits motions for preliminary injunctions
10 and responses to 10 pages. Given that Plaintiff's Motion will address the merits of
11 its constitutional claims, the parties have agreed to a 20-page limit.

12 The parties respectfully request that this Court approve their proposed
13 briefing schedule and request to exceed the page limits for the Motion for
14 Preliminary Injunction and Response in Opposition and order the same.

15 Respectfully submitted this 4th day of April 2023,

17 s/ Katherine Anderson

18 Katherine Anderson
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s/ Daniel Jeon

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on April 4th, 2023, I electronically filed the foregoing paper with the Clerk of Court using the ECF system which will send notification of such filing to all counsel of record.

s/ Katherine Anderson

Katherine Anderson